

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re	:	Chapter 9
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CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
	:	
-----X	:	

**CONSOLIDATED REPLY IN SUPPORT OF MOTION OF THE CITY OF  
DETROIT, PURSUANT TO SECTIONS 105(a) AND 502(c) OF THE  
BANKRUPTCY CODE AND BANKRUPTCY RULE 3021, FOR AN ORDER  
APPROVING RESERVE AMOUNTS FOR CERTAIN DISPUTED OR  
UNLIQUIDATED UNSECURED CLAIMS IN CONNECTION WITH  
DISTRIBUTIONS TO BE MADE UNDER THE EIGHTH AMENDED  
PLAN FOR THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT**

The City of Detroit (the "City") hereby files this consolidated reply in support of the *Motion of the City of Detroit, Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and Bankruptcy Rule 3021, for an Order Approving Reserve Amounts for Certain Disputed or Unliquidated Unsecured Claims in Connection with Distributions to Be Made Under the Eighth Amended Plan for*

*the Adjustment of Debts of the City of Detroit* (Docket No. 9351) (the "Motion")<sup>1</sup> and respectfully represents as follows:

**Preliminary Statement**

1. A total of 33 timely and untimely responses or objections to the Motion (collectively, the "Responses") were filed by the parties identified below (collectively, the "Respondents"). A chart summarizing the Responses to the Motion and the City's arguments in reply to them is attached hereto as Exhibit A and incorporated herein by reference. The City has attempted to communicate with each of the Respondents to the extent that a telephone number was provided in the relevant Response. As a result of contacting Respondents, the City has succeeded in resolving certain of the Responses, as set forth below.

2. In addition, the City received several informal communications regarding the relief requested in the Motion. In connection with two such informal communications, the City agreed to make modifications to (a) the Schedule of Liquidated Amounts and (b) the Schedule of Reclassification Claims, attached to the Motion as Exhibit 6.1 and Exhibit 6.6, respectively.<sup>2</sup> These modifications

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

<sup>2</sup> Consistent with the *Order (A) Expunging Proofs of Claim Nos. 1120, 1136 and 1197 Filed by Wilmington Trust, N.A.; (B) Reducing Proof of Claim*

result in a modest increase in the aggregate amount of Liquidated Amounts from \$967,107,874.39 to \$967,997,152.05 but no overall increase in the Disputed Unsecured Claims Reserve because the City previously rounded the aggregate total of Liquidated Amounts to \$968,000,000. See Motion, at ¶ 18. Copies of the revised Schedule of Liquidated Amounts and Schedule of Reclassification Claims identifying the revisions agreed to by the City are attached hereto as Exhibit B and Exhibit C, respectively.

3. As set forth below, the filed Responses generally either (a) misapprehend the nature of the relief requested in the Motion or (b) roundly

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(continued...)

*No. 1138 Filed by Wilmington Trust, N.A.; and (C) Providing for the Withdrawal With Prejudice of (1) Objections to Confirmation and (2) Response to the Rejection of the COPs Service Contracts, Filed By Wilmington Trust, N.A. (the "Wilmington Trust Claim Order") (Docket No. 8423), the Schedule of Reclassification Claims and the Schedule of Liquidated Amounts have both been revised by the City to reflect (a) the inclusion of claim number 1138 of Wilmington Trust, N.A. (the "Wilmington Trust Claim") on the Schedule of Liquidated Amounts in the amount of \$644,277.66 (as set forth in the Wilmington Trust Claim Order) and (b) removal of the Wilmington Trust Claim from the Schedule of Reclassification Claims. In addition, the City agreed to increase the Liquidated Amount reserved on account of claim number 1129 of Anthony Baker from \$55,000 to \$300,000. These modifications are highlighted on the revised exhibits attached hereto.*

ignore the relief requested therein and seek another opportunity to contest confirmation or consummation of the City's Plan.

4. With respect to the former category, the sole purpose of the Motion is to establish a conservative Disputed Unsecured Claims Reserve that will allow for initial distributions to be made to holders of Allowed Other Unsecured Claims in Class 14 under the Plan. Nothing in the Motion affects any claimant's substantive right to receive a recovery in Class 14 under the Plan or, in the alternative, to assert that such claimant's claim should not be subject to treatment in Class 14. For example, the City's exclusion of the Unimpaired Claims from the calculation of the Disputed Unsecured Claims Reserve reflects its assessment that each of the Unimpaired Claims likely would not be subject to treatment in Class 14 and, therefore, the City need not reserve a share of the "pot" of New B Notes on account of such claims. Nevertheless, to the extent that any claim classified as an Unimpaired Claim ultimately is determined to be subject to treatment in Class 14, the proposed Disputed Unsecured Claims Reserve is expected to contain ample reserves of New B Notes to provide a source of pro rata recovery for such claim.<sup>3</sup>

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<sup>3</sup> The City notes that the proposed Disputed Unsecured Claims Reserve of \$1.035 billion is approximately seven times greater than the City's estimated

5. Nothing in the Motion: (a) reclassifies any claim; (b) reduces, increases or liquidates the amount of any claim; (c) guarantees any claimant any specific treatment under the Plan; or (d) compels any claimant to accept a recovery in any form other than that provided for under the Plan and the Confirmation Order. Both the Respondents' and the City's rights to address substantive issues relating to the amount, validity and classification of claims are fully preserved.

6. With respect to the category of Responses that seek to overturn confirmation of the Plan or delay its consummation, that relief is not available to the applicable claimants by way of an objection to the Motion. On November 12, 2014, the Court entered the Confirmation Order confirming the Plan. Although several parties filed motions seeking a stay of the effectiveness of the Confirmation Order pending adjudication of their appeals, (see, e.g., Docket Nos. 8341, 8413, 8426, 8429, 8483) (collectively, the "Stay Motions"), the Court denied this relief (see Docket No. 8533), and no party sought such a stay from the United States

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(continued...)

aggregate liability on account of Class 14 Other Unsecured Claims of \$150 million disclosed in the *Fourth Amended Disclosure Statement With Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit City's Disclosure Statement* (Docket No. 4391), which was approved by the Court for use in soliciting votes on the Plan. See Docket No. 4391, at 41.

District Court for the Eastern District of Michigan (the "District Court") or any other court. The Effective Date occurred on December 10, 2014. See Notice of (I) Entry of Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit and (II) Occurrence of Effective Date (Docket No. 8649).

7. As such, the City is authorized and required to move forward with completing consummation of the Plan. Numerous activities to consummate the Plan already have occurred. See Post-Confirmation Status Report of the City of Detroit, Michigan (Docket No. 9306), at 5-13. In addition, the City must (a) establish the Disputed Unsecured Claims Reserve (see Plan, at § VI.B) and (b) make distributions to holders of Allowed Other Unsecured Claims in Class 14 under the Plan "as soon as reasonably practicable after the Effective Date" (see Plan, at § II.B.3.u.i). The Motion is a step towards accomplishing these requirements. The Respondents' attempt to use the Motion as a vehicle to raise collateral attacks on the Confirmation Order and consummation of the Plan is improper, and the Responses should be overruled.

## **The Responses**

8. The following Responses to the Motion were filed by the Respondents identified below:<sup>4</sup>

- (a) the Responses of Hassan Aleem and Dorothea Harris, Dorothea Harris, Walter Blaney, Janice Pickett, Olivia Williams and Debra Pickett (Docket Nos. 9487, 9494, 9496, 9498, 9499 and 9500, respectively) (collectively, the "Form Responses");
- (b) the Responses of Raphael Robinson, Sandra Bradford, Brenda Polk, Patricia Mason, Joan Robinson-Cheeks, Larry Johnson, Eugene Mason, Comit Bradford, Jr., Gwendolyn Morris and Lee Newby (Docket Nos. 9579, 9580, 9581, 9583, 9584, 9585, 9586, 9587, 9588 and 9589, respectively) (collectively, the "Late Form Responses");
- (c) the Responses of Belinda Farhat, Wanda Jan Hill, Vera Magee, Lucinda J. Darrah and Carl Williams (Docket Nos. 9513, 9514, 9516, 9517 and 9591, respectively) (collectively, the "Notice Responses");

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<sup>4</sup> In addition to these 33 Responses, the Court previously entered orders striking eight papers filed by the following parties that generally raised issues similar to the Responses: (a) Bridget Murriel (Docket Nos. 9450 and 9520) (stricken by Docket Nos. 9561 and 9526, respectively); (b) Delshone Balfour (Docket Nos. 9485 and 9522) (stricken by Docket Nos. 9512 and 9611, respectively); (c) Kevin Bullard (Docket No. 9488) (stricken by Docket No. 9610); (d) Lue David Jackson (Docket No. 9501) (stricken by Docket No. 9626); (e) Pamela Jenkins (Docket No. 9502) (stricken by Docket No. 6929); and (f) Lisa Rollins-Carter (Docket No. 9510) (stricken by Docket No. 9630).

- (d) the Response of Henry Brown (Docket No. 9449) (the "Brown Response");
- (e) the Responses (together, the "Murriel Responses") of Bridget Murriel: (i) Docket No. 9461 (the "Timely Murriel Response") and (ii) Docket No. 9538 (the "Late Murriel Response");
- (f) the Response of Kim Lamar Spicer (Docket No. 9474) (the "Spicer Response");
- (g) the Response of Eddie Lott Jones (Docket No. 9478) (the "Jones Response");
- (h) the Responses (together, the "Patterson Responses") of Delania Patterson: (i) Docket No. 9486 (the "Timely Patterson Response") and (ii) Docket No. 9573 (the "Late Patterson Response");
- (i) the Response (Docket No. 9489) (the "DFFA Response") of the Detroit Fire Fighters Association, I.A.F.F., Local 344 (the "DFFA");
- (j) the Response of Steven Wolak (Docket No. 9493) (the "Wolak Response");
- (k) the Response of Brianna Taylor (Docket No. 9495) (the "Taylor Response");
- (l) the Response of Lucinda J. Darrah (Docket No. 9497) (the "Darrah Response"); and
- (m) the Response of Muhammad Sharif (Docket No. 9590) (the "Sharif Response").

## Reply

### ***The Form Responses, the Late Form Responses, the Jones Response and the Darrah Response Are Attempted Collateral Attacks on the Confirmation Order and Consummation of the Plan***

9. Each of the Form Responses and Late Form Responses employs the same fill-in-the-blank response document containing identical objections. These objections consist of arguments regarding (a) the good-faith filing of the Plan, (b) the Plan voting process, (c) the treatment of OPEB Claims under the Plan and (d) ASF Recoupment. The Jones Response similarly objects to the Motion on the basis that the Plan impaired the Respondent's Pension Claim. These arguments are irrelevant to the relief requested in the Motion and seek merely to collaterally attack the Plan and the Confirmation Order.

10. The Darrah Response seeks to halt consummation of the Plan and distributions to holders of Class 14 claims pending the District Court's adjudication of the Respondent's appeal of the Confirmation Order. For the reasons previously stated, however, following the Court's denial of the Stay Motions and the occurrence of the Effective Date, the City is authorized and required to proceed with consummation of the Plan, including by making distributions to holders of claims in Class 14 "as soon as reasonably practicable." Plan, at § II.B.3.u.i.

11. The parties that filed the Form Responses and the Late Form Responses also argue that notice of the Motion was insufficient. The City, however, provided notice of the Motion to all parties affected by the requested relief, i.e., all parties with claims classified in Class 14 under the Plan (or that would be classified in Class 14 under the Plan if they were not Unimpaired Claims) in addition to all parties that have requested service of documents in the Chapter 9 Case. See Motion, at ¶ 37; Certificates of Service (Docket Nos. 9384, 9410). It was not necessary for the City to provide notice of the Motion to holders of claims classified in other classes (e.g., Pension Claims and OPEB Claims) that are unaffected by the relief requested in the Motion.

12. The City therefore requests that the Court overrule these Responses because they present no ground for denial of the Motion. In addition, the Court should disregard the Late Form Objections, which were filed more than one week after the March 23, 2015 deadline for filing Responses to the Motion (the "Objection Deadline").

***The Notice Responses, the Murriel Responses and the Spicer Response Assert No Grounds for Objecting to the Motion***

13. The Notice Responses consist only of a notice of objection, a certificate of service and an affidavit affirming the truth of their contents. They assert no substantive objection to the Motion. In addition, the Notice Response of Carl Williams was filed more than one week after the Objection Deadline.

14. The Timely Murriel Response states only that the Respondent "reject[s]" the Motion, and the Late Murriel Response merely provides certain irrelevant information regarding the alleged factual basis for the Respondent's claim.

15. The Spicer Response similarly describes the Respondent's underlying claim and follows by "certify[ing]" that the Respondent opposes the Motion. The City has discussed the basis for the Motion with Mr. Spicer, who has indicated that he no longer intends to pursue the Spicer Response.

16. Because these Responses state no cognizable grounds for objecting to the Motion, the Court should overrule them.

***The Brown Response Incorrectly Assumes  
that the Motion Caps Available Recoveries***

17. The Brown Response argues that the Motion limits the available recovery on the Respondent's claim, presumably by reserving a fixed number of New B Notes on account of the Respondent's claim. As stated above, however, nothing in the Motion limits the relief available to any party. Moreover, the City excluded the Respondent's claim from the calculation of the Disputed Unsecured Claims Reserve because the City believes that, to the extent valid, it likely is an Unimpaired Claim. Nevertheless, in the event that the Respondent's claim is determined to be subject to treatment in Class 14 under the Plan, the City believes that there will be ample reserves in the proposed Disputed Unsecured

Claims Reserve to provide the Respondent with a source of recovery on par with all other Class 14 claimants, as discussed above. The City has been unable to convey this information to the Respondent, however, because he is incarcerated. The City therefore requests that the Court deny the Brown Response.

***The Patterson Responses Relate to an Unimpaired Claim***

18. The Patterson Responses object to the City's omission of the Respondent's claim from the Schedule of Liquidated Amounts. The Respondent's claim was omitted because the City believes that it likely constitutes a "claim[]" against officers or employees of the City in their individual capacity under 42 U.S.C. § 1983," which are not enjoined by the Plan. See Confirmation Order, at ¶ 32. Such claims, therefore, constitute Unimpaired Claims under the Motion because they are payable in cash by the City and not New B Notes (to the extent that such claims are valid and supported by an enforceable indemnification obligation). If the Respondent's Claim is determined to be an Unimpaired Claim, the City need not reserve a pro rata share of New B Notes on account of the claim because the claim will not be subject to treatment in Class 14. In the event that the Respondent's claim is found not to be an Unimpaired Claim, the City submits that the proposed Disputed Unsecured Claims Reserve establishes ample reserves of New B Notes to provide a source of pro rata recovery on Respondent's Claim.

19. Although the Patterson Responses have not been formally withdrawn, counsel to the Respondent has informed the City that it no longer intends to pursue the Patterson Responses.

***The City Has Amended the Schedule of Wholly Unliquidated Litigation Claims to Address the Concerns of the DFFA***

20. The DFFA Response purports to reserve the DFFA's rights to present its views regarding the relief requested in the Motion, and the DFFA filed no other Response to the Motion prior to or following the Objection Deadline. Nevertheless, the City has communicated with counsel to the DFFA and has agreed to add certain claims to the Schedule of Wholly Unliquidated Litigation Claims, which was attached as Exhibit 6.2 to the Motion. A copy of the revised Schedule of Wholly Unliquidated Litigation Claims highlighting these modifications is attached hereto as Exhibit D. The City and the DFFA have agreed not to modify the amount of the Disputed Unsecured Claims Reserve on account of these unliquidated claims, however, because the relevant amounts in controversy will not have a material effect on the reserve. The City understands that these modifications resolve the concerns of the DFFA.

***The Concerns Raised in the Wolak Response Do Not Implicate the Relief Requested in the Motion***

21. The Wolak Response argues that the applicable Respondent's claim – which is based upon a prepetition settlement of certain litigation – should

not be subject to impairment under the Plan. Attached as an exhibit to the Wolak Response is a copy of an order from the Wayne County Circuit Court, dated May 13, 2013, approving a settlement in the amount of \$375,000 (although the Respondent's proof of claim was asserted in the amount of \$3,000,000). The City believes that the Respondent's claim may be an Unimpaired Claim, in whole or in part. Nevertheless, to be conservative, the City proposed establishing a reserve on account of the Respondent's claim in the full asserted amount of the proof of claim, i.e., \$3,000,000. Notwithstanding this ample reserve, nothing in the Motion prejudices any right the Respondent may have to assert that his claim should not be subject to treatment in Class 14 under the Plan. Accordingly, the Wolak Response should be overruled.

***The Taylor Response and the Sharif  
Response Relate to Class 15 Convenience Claims***

22. The Taylor Response relates to proof of claim number 1146, which is asserted in the amount of \$17,500. By the Taylor Response, the Respondent asserts that she settled her claim against the City for this amount

prior to the Petition Date and argues that her claim should not be impaired and should be paid out of an unidentified fund.<sup>5</sup>

23. As discussed above, however, nothing in the Motion affects whether or not any claim is subject to impairment under the Plan – that is governed by the Plan itself. Moreover, to the extent the Respondent possesses an enforceable claim against the City in the amount of \$17,500, it would be subject to treatment as a Convenience Claim in Class 15 under the Plan and would not receive a pro rata share of New B Notes. See Plan, at § I.A.76 (defining "Convenience Claim," in relevant part, as "a Claim that would otherwise be an Other Unsecured Claim that is (a) an Allowed Claim in an amount less than or equal to \$25,000.00; or (b) in an amount that has been reduced to \$25,000.00 pursuant to an election made by the Holder of such Claim"); id. at § II.B.3.b.i (providing that holders of Allowed Convenience Claims receive "Cash equal to the amount of 25% of such Allowed Claim[s]" and not a share of New B Notes). The City has spoken with the Ms. Taylor and explained that the Motion does not affect her claim in any way. As of the date hereof, however, Ms. Taylor has not agreed to withdraw the Taylor Response.

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<sup>5</sup> The Taylor Response also alleges certain shortcomings with respect to the Respondent's counsel, which arguments are irrelevant to the relief requested in the Motion.

24. The Sharif Response relates to proof of claim number 3275, which was filed by the applicable Respondent in the amount of \$5,943.24. Like the Taylor Response, the claim at issue is a Convenience Claim that is not subject to treatment in Class 14 under the Plan.<sup>6</sup>

25. Because the Taylor Response and the Sharif Response are irrelevant to the distribution of New B Notes under the Plan and the relief requested in the Motion, they should be overruled.

### **Conclusion**

For the foregoing reasons, the City requests that the Court enter an order substantially in the form attached to the Motion as Exhibit 1: (a) approving the establishment of the Disputed Unsecured Claims Reserve, as modified by the revised Schedule of Liquidated Amounts and Schedule of Reclassification Claims attached hereto; and (b) overruling the Responses.

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<sup>6</sup> In addition, the Sharif Response was filed more than one week after the Objection Deadline.

Dated: April 10, 2015

Respectfully submitted,

/s/ Heather Lennox

Heather Lennox (OH 0059649)

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ATTORNEYS FOR THE CITY

**EXHIBIT A**

**TABLE OF RESPONSES AND THE CITY'S REPLIES<sup>1</sup>**

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Hassan Aleem and Dorothea Harris	9487	This Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Walter Blaney	9496	This Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. <u>See</u> Reply, at ¶¶ 6-7, 9-12.

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the foregoing *Consolidated Reply in Support of Motion of the City of Detroit, Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and Bankruptcy Rule 3021, for an Order Approving Reserve Amounts for Certain Disputed or Unliquidated Unsecured Claims in Connection with Distributions to Be Made Under the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit* (the "Reply").

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Comit Bradford, Jr.	9587	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Sandra Bradford	9580	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Henry Brown	9449	The Response incorrectly suggests that the Motion limits the Respondent's potential recovery on his claim. Nothing in the Motion limits the relief available to any party. Moreover, the City excluded the Respondent's claim from the calculation of the Disputed Unsecured Claims Reserve because the City believes that, to the extent valid, it likely constitutes an Unimpaired Claim. <u>See</u> Reply, at ¶ 17.

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Lucinda Darrah	9497	This Response seeks to delay distributions of New B Notes to holders of Allowed Claims in Class 14 under the Plan pending adjudication of the Respondent's appeal of the Confirmation Order. The Response constitutes an improper attempted collateral attack on the Confirmation Order and consummation of the Plan, and improperly seeks to obtain a stay of the Confirmation Order (which the Court previously denied). Following the Court's denial of the Stay Motions and the occurrence of the Effective Date, the City is authorized and required to proceed with consummation of the Plan, including by making distributions to holders of claims in Class 14 "as soon as reasonably practicable." Plan, at § II.B.3.u.i. The Response otherwise raises no substantive arguments relevant to the relief requested in the Motion. <u>See</u> Reply, at ¶¶ 6-7, 10.
Lucinda Darrah	9517	This Notice Response asserts no substantive basis whatsoever for objecting to the Motion. <u>See</u> Reply, at ¶¶ 13-16.
Detroit Fire Fighters Association, I.A.F.F., Local 344	9489	The City has agreed with the DFFA to revise the Schedule of Wholly Unliquidated Litigation Claims that was attached as <u>Exhibit 6.2</u> to the Motion to include certain additional claims asserted by the DFFA. The City and the DFFA have agreed not to modify the amount of the Disputed Unsecured Claims Reserve on account of these unliquidated claims, however, because the relevant amounts in controversy will not have a material effect on the reserve. A copy of the revised Schedule of Wholly Unliquidated Litigation Claims is attached to the Reply as <u>Exhibit D</u> . The City understands that these revisions resolve the DFFA Response. <u>See</u> Reply, at ¶ 20.
Belinda Farhat	9513	This Notice Response asserts no substantive basis whatsoever for objecting to the Motion. <u>See</u> Reply, at ¶¶ 13-16.

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Dorothea Harris	9494	This Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Wanda Jan Hill	9514	This Notice Response asserts no substantive basis whatsoever for objecting to the Motion. <u>See</u> Reply, at ¶¶ 13-16.
Larry Johnson	9585	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Eddie Jones	9478	The Response objects to the Motion on the basis that the Plan impaired the Respondent's Pension Claim. This Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. <u>See</u> Reply, at ¶ 6-7, 9.
Vera C. Magee	9516	This Notice Response asserts no substantive basis whatsoever for objecting to the Motion. <u>See</u> Reply, at ¶¶ 13-16.
Eugene Mason	9586	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Patricia Mason	9583	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Gwendolyn Morris	9588	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Bridget Murriel	9461	The Response states only that the Respondent "reject[s]" the relief requested in the Motion and otherwise raises no substantive arguments whatsoever. <u>See</u> Reply, at ¶¶ 13-16.
Bridget Murriel	9538	The Response provides certain irrelevant information regarding the alleged factual basis for the Respondent's claim, but otherwise raises no substantive arguments regarding the relief requested in the Motion. In addition, the Response was not filed until three days after the Objection Deadline. <u>See</u> Reply, at ¶¶ 13-16.
Lee Newby	9589	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Delania Patterson	9486	The Response argues that the Respondent's claim was improperly omitted from the Schedule of Liquidated Amounts attached as Exhibit 6.1 to the Motion. The City omitted the Respondent's claim because it determined that this claim likely is an Unimpaired Claim, as such term is defined in the Motion. The Respondent has informed the City that it no longer intends to pursue the Response. <u>See</u> Reply, at ¶ 18-19.
Delania Patterson	9573	The Response argues that the Respondent's claim was improperly omitted from the Schedule of Liquidated Amounts attached as Exhibit 6.1 to the Motion. The City omitted the Respondent's claim because it determined that this claim likely is an Unimpaired Claim, as such term is defined in the Motion. The Respondent has informed the City that it no longer intends to pursue the Response. <u>See</u> Reply, at ¶ 18-19.
Debra Pickett	9500	This Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Janice Pickett	9498	This Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. <u>See</u> Reply, at ¶¶ 6-7, 9-12.

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Brenda Polk	9581	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Raphael Robinson	9579	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Joan E. Robinson-Cheeks	9584	This Late Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Late Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. Further, this Response was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Muhammad Sharif	9590	The Respondent possesses a Convenience Claim in Class 15 under the Plan, which claims receive cash payments and not a share of New B Notes. The relief sought in the Motion does not affect this claim. In addition, the Response asserts no substantive objection to the Motion. Reply, at ¶ 22-23.
Kim Lamar Spicer	9474	This Response asserts no substantive objection to the Motion. The City has communicated with the Respondent who informed the City that he no longer wishes to pursue the Response. <u>See</u> Reply, at ¶¶ 13-16.

<b>Respondent</b>	<b>Docket Number of Response</b>	<b>City's Reply to Response</b>
Brianna Taylor	9495	The Respondent possesses a Convenience Claim in Class 15 under the Plan, which claims receive cash payments and not a share of New B Notes. In addition, the Response asserts no substantive objection to the Motion. The relief sought in the Motion does not affect this claim. The City has communicated with the Respondent and explained the purpose of the Motion, although she has not agreed to withdraw her Response. Reply, at ¶ 22-23.
Carl Williams	9591	This Notice Response asserts no substantive basis whatsoever for objecting to the Motion. In addition, it was filed more than one week after the Objection Deadline. <u>See</u> Reply, at ¶¶ 13-16.
Olivia Williams	9499	This Form Response constitutes an attempted collateral attack on the Confirmation Order and raises no substantive arguments relevant to the relief requested in the Motion. This Form Response also challenges notice of the Motion; however, the City provided sufficient notice of the Motion under the circumstances to the parties subject to this relief. <u>See</u> Reply, at ¶¶ 6-7, 9-12.
Steven Wolak	9493	The Respondent argues that his claim – which is based upon a prepetition settlement of certain litigation – should not be subject to impairment under the Plan. Nothing about the relief requested in the Motion, however, will affect whether or not the Respondent's claim is subject to impairment under the Plan—that is a function of the Plan itself. Moreover, the City has proposed to reserve in the Disputed Unsecured Claims Reserve on account of the full asserted amount of Respondent's proof of claim (\$3,000,000) rather than the amount of the settlement disclosed in the Response (\$375,000). Accordingly, the Respondent's interests are more than adequately protected by the Motion. The City has communicated with counsel to the Respondent regarding the Motion. As of the date hereof, the Respondent has not indicated whether or not he intends to pursue his Response. <u>See</u> Reply, at ¶ 21.

**EXHIBIT B**

**REVISED SCHEDULE OF LIQUIDATED AMOUNTS**

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
1269	16600 Greenfield, LLC	\$58,365.18
1841	415 East Congress, LLC	\$1,563,107.76
880	Adams, Eddie	\$277,550.61
3577	Adams, Tanora	\$50,000.00
3208	Adedokun, Silifat	\$250,000.00
2534	Adler Stilman, PLLC	\$500,000.00
1062	ADP, INC.	\$29,644,827.50
909	Advance Digital Systems, LLC	\$65,747.50
910	Advance Digital Systems, LLC	\$115,330.03
1366	AdvisaCare Healthcare Solutions, Inc.	\$138,669.42
297	Affiliated Diagnostics	\$289,500.00
776	Agar Lawn Sprinkler Systems Inc	\$189,752.63
3066	Ahmad, Khadijah	\$209,085.85
3676	Airgas USA LLC	\$55,793.34
491	Aj & Associates At Law	\$50,000.00
1135	Albert, Randal	\$225,000.00
2192	Alford, Marlon	\$104,354.17
1743	Al-Talaqani, Ali	\$100,000.00
1742	Al-Talaqani, Jabir	\$100,000.00
3175	Amos, Seville	\$100,000.00
971	Anderson, Patrice	\$237,500.00
1258	Anderson, Patricia	\$300,000.00
551	Anderson, Perry	\$50,000.00
3578	Andrews, Renee	\$40,000.00
3579	Andrews, Sean Derrick	\$40,000.00
2852	Association of Prof. Construction Inspectors & Cleveland Gregory	\$40,000.00
1066	AT&T Services, Inc.	\$8,487,525.24
1649	Atkins, Faye	\$48,000.00
1811	Bagby, Lloyd	\$250,000.00
1129	Baker, Anthony	\$300,000.00
2926	Balfour, Delshone	\$29,176.02
1994	Banks, Ladonna	\$40,000.00
1018	Barrett Paving Materials Inc	\$45,394.51
1436	Barthel Contracting Co	\$26,304.97
586	Baugh, Laura J.	\$47,000.00
2260	Bell, Shelton (estate Of) P/r, Tammy Howard	\$75,000.00
2704	Benson, Terryton	\$110,900.00
1655	BeVelle, Glenn	\$60,000.00
201	Beydoun, Michael & his attorney- Raymond Guzall III	\$2,273,668.23
1790	Bishop Real Estate, L.L.C	\$55,667.53
758	Blaze Contracting Inc	\$354,143.68
2835	Boland, S.R.	\$25,914.21
2373	Bolton, Dinah Lynn	\$49,793.19
3259	Bonner, Michael	\$100,000.00
2051	Booker, Marie Cynthia	\$250,000.00
186	Boone, Therone	\$500,000.00
396	Borden, James	\$500,000.00
1211	Bradford Jr., Comit	\$1,000,000.00
2277	Brandt, Charlotte	\$75,000.00
1338	Brannon, Mitchell	\$100,000.00
999	Bratcher, Shannon	\$27,500.00
1608	Brazell, Gregory	\$300,000.00
1618	Brazell, Gregory	\$800,000.00
1246	Bricest, Ernest	\$100,000.00
1245	Bricest, Tammy	\$100,000.00
1007	Brooks, Christopher	\$35,000.00
1544	Brooks, I-chauntay	\$75,000.00
1643	Brooks, Latonya	\$150,000.00
345	Brooks, Ruth	\$60,000.00
398	Brooks, Ruth B.	\$60,000.00
2161	Brovold, Thor	\$350,000.00
1221	Brown, Jessica Et Al	\$30,000.00
3667	Brown, Johnathan (on behalf of himself and a class of others similarly situated)	\$143,437,440.00
1805	Brown, Ruffell	\$100,000.00
826	Burrell, Sharanda	\$320,000.00
1001	Burton, Jennifer	\$55,000.00
1537	Cade, Alyse	\$55,000.00

# REVISED SCHEDULE OF LIQUIDATED AMOUNTS

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
682	Cadoura, Richard	\$100,000.00
1438	Calloway, Lorraine	\$32,500.00
1832	Campbell, Taylor	\$2,000,000.00
1823	Cannon, Gladys M.	\$27,481.72
85	Canon Financial Services, Inc.	\$43,366.38
841	Carmichael, Jonathan	\$100,000.00
520	Cato, John	\$339,326.97
411	Cellco Partnership D/B/A Verizon Wireless	\$46,198.34
2532	Chandler, Albert W.	\$90,000.00
3026	Charter County of Wayne	\$700,000.06
3031	Charter County of Wayne	\$418,555.95
3035	Charter County of Wayne	\$132,790.00
3823	Charter County of Wayne	\$30,000,000.00
2625	Cherry, Jerome	\$33,201.00
2202	Childers, Debra	\$150,000.00
2790	Clark, Articia	\$1,000,000.00
3354	Clark, Bennie E.	\$350,000.00
3467	Clarke, Janice E.	\$38,000.00
3213	Clement, Fern	\$41,128.50
2851	Coalition Of Detroit Unions Et Al,	\$242,586,116.50
2278	Coalition of Public Safety Employees Health Trust	\$453,465.52
2819	Cohen, Lamont S.	\$200,000.00
2690	Coleman, Marcel	\$50,000.00
164	Collier, Anthony	\$200,000.00
2007	Collins, John	\$65,000.00
914	Conaway, Brenda	\$55,000.00
3646	Consolidated Rail Corporation	\$36,038.73
1893	Cook, Harriet A.	\$30,000.00
2180	Cook, William	\$100,000.00
2912	Cooney, Plunkett	\$72,288.74
1979	Cooper, Michael	\$30,000.00
395	Cooper, Monique	\$500,000.00
1967	Corbin-Johnson, Michele	\$28,000.00
2040	Corker, Katherine	\$140,000.00
1830	Craig, Kevin	\$75,000.00
1466	Crutcher, Leon	\$40,000.00
1059	Cummings, McClorey, Davis & Acho, PLC	\$106,524.94
1489	Cunningham, Darshay	\$75,000.00
3197	Curry, Jacqueline	\$100,000.00
3015	Dandridge, Doris B.	\$250,000.00
2911	Danforth Brown, Tara R.	\$27,665.46
1009	Daniels, Joyce	\$125,000.00
967	Davis, Diane	\$500,000.00
3387	Davis, Eduardo A.	\$28,926.10
3146	Davis, Marie A.	\$60,000.00
1156	Davis, Sherrod	\$150,000.00
1334	Davis, Susan K.	\$65,000.00
966	Davistion, Frank	\$60,000.00
397	Delfine, Robert T.	\$500,000.00
3074	Demoss, Donald Herman	\$50,000.00
1578	Denson, Velma	\$40,000.00
2217	Detroit Electrical Services, LLC	\$248,607.10
3487	Detroit Fire Fighters Association, IAFF Local 344	\$186,382.00
842	Dillard, James	\$200,000.00
1745	Dixon, Tiffany	\$300,000.00
1276	DTE Electric Company f/k/a/ the Detroit Edison Company	\$40,257.24
1274	DTE Energy Company	\$3,240,924.00
2330	Duff, Michelle	\$39,997.50
3345	Duncan, Warren T.	\$33,074.05
2894	Easley, Gloria	\$37,862.50
2014	Edwards, Brittany B/h/n/f Dwayne Witherington	\$1,500,000.00
846	Edwards, Brittany B/h/n/f Dwyane Witherington	\$300,000.00
627	Edwards, Darrick	\$150,000.00
603	Edwards, Vergiline	\$75,000.00
3685	Electrical Workers Fringe Benefit Funds of Local #58, IBEW	\$175,013.39
1965	Ellis, Belinda F.	\$500,000.00
2206	Ellis, Lunitrice	\$450,000.00

**REVISED SCHEDULE OF LIQUIDATED AMOUNTS**

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
3169	Ellison, James	\$100,000.00
1033	Emerson Process Management Power & Water Solutions, Inc.	\$468,462.13
2031	Estes, Dominica	\$65,000.00
2716	Evans, Mary	\$100,000.00
759	Examworks Inc	\$38,820.78
559	Exander, Poe	\$50,000.00
665	Fakhoury Law Firm Pc	\$88,637.41
1131	Farris, Branda	\$400,000.00
2183	Fenroy, Tammy	\$125,000.00
227	Fields, Delta	\$300,000.00
552	Fields, Vincent	\$50,000.00
1484	Fletcher, Kim D.	\$25,914.21
2574	Frank Haron Weiner PLC	\$28,280.56
553	Freeman, Arnold	\$50,000.00
1335	Garcia, Ricardo	\$100,000.00
3195	Gardner, Edward D.	\$100,000.00
13	Gargalino, Shawn	\$75,000.00
1259	Garrett, Bobbie	\$250,000.00
1990	Garza, Kimberley A.	\$80,000.00
1075	General Shale Brock Company	\$27,271.94
3163	Gerhard, Eady	\$32,981.44
1600	Ghaleb, Theresa	\$200,000.00
2525	Gibson, Brian J.	\$80,000.00
976	Gilstrap, Jenniger	\$60,000.00
2032	Gjergji, Gjush	\$55,000.00
554	Glenn Jr., Ralph	\$50,000.00
3118	Godbott, Darrin	\$50,000.00
2346	Gonzalez, Carolyn T.	\$55,400.00
927	Goodwin, Philomena	\$637,500.00
1975	Gouch, Antoinette	\$27,000.00
1507	Goudy, Larentinna	\$200,000.00
2314	Governing Board of the City of Detroit Employee Benefit Plan	\$36,314.14
598	Government Jobs.Com	\$77,800.00
2727	Gowens, Shante	\$3,000,000.00
1910	Green, Glenn	\$55,000.00
1064	Greer, Abraham and Sandra	\$1,500,000.00
1932	Grice, Linda	\$130,000.00
699	Grier & Copeland Pc	\$89,049.35
928	Guest, Shuntina	\$40,000.00
2357	Guilbeaux, Debra F	\$50,000.00
177	Gustafson, Barbara, as Next Friend for Shawn Gustafson, a minor	\$35,000.00
1845	H.D.V. Greektown, LLC	\$1,563,107.76
1645	Hall, Angela	\$150,000.00
474	Hall, Richard	\$100,000.00
1097	Hall, Richard	\$1,000,000.00
1373	Hampton, Crystal	\$30,000.00
285	Hardricks, Elijah	\$750,000.00
3309	Harold W. Taylor	\$37,752.50
1420	Harper, Tony A.	\$30,000.00
2169	Harris, Jerry	\$400,000.00
2533	Harris, Kimberly	\$30,000.00
1928	Harris, Lord	\$1,000,000.00
3458	Harris, Lorraine	\$40,000.00
2733	Harris, Sammie Kevin	\$100,000.00
1575	Harris-Barnes, Jennifer	\$250,000.00
1375	Harvey, Gregory	\$75,000.00
108	Hassan Hassan	\$20,000,000.00
1574	Hassan, Henry	\$500,000.00
2908	Hawkins, Aisha	\$30,000.00
1771	Heard, Casadaria	\$45,000.00
3081	Heard, Darwin L.	\$35,000.00
2927	Hearn, Charlene	\$25,750.00
1389	Hill, Clark	\$45,000.00
1759	Holt, Kenneth	\$37,500.00
485	Horton, Akeila and Thornton, Anthony	\$490,000.00
2244	Houston Jr., Dwight	\$150,000.00
1068	Howard & Howard Attorneys PLLC	\$90,028.30

# REVISED SCHEDULE OF LIQUIDATED AMOUNTS

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
3405	Hubbard, Daniel	\$26,145.48
2232	Hunt, Sceciila	\$300,000.00
2945	Hunter-Rosier, Elizabeth	\$500,000.00
2651	Hyde Park Co-Operative	\$5,000,000.00
89	IBM CORPORATION	\$119,726.23
1302	Inland Waters Pollution Control, Inc.	\$2,000,000.00
1367	Iron Mountain Information Management, Inc.	\$217,366.80
3825	Iron Mountain Information Management, LLC	\$227,430.78
2930	Ivory, Ebonie	\$500,000.00
3497	Jackies Transport, Inc.	\$53,725.50
2414	Jackson, Jacqueline M.	\$45,287.29
1074	Jackson, Lue David	\$71,825.81
2042	Jackson, Vernell	\$75,000.00
2276	Jacob, Jessy S.	\$505,635.76
120	Jarrett,Zenda via her attorneys Gursten, Koltonow, Gursten, Christensen & Raitt PC	\$55,000.00
672	Jbahi, Ibrahim K.	\$103,151.20
2266	Jefferson, Wendy	\$75,000.00
670	Jenkins, Albert	\$90,000.00
467	Jenkins, Albert H.	\$90,000.00
555	Jennings, Jamal	\$50,000.00
673	Jiddou, Firas	\$202,755.00
3346	Joe-Davis, Stephanie	\$42,200.00
2030	Johnson, Brandy	\$33,000.00
2187	Johnson, Darton	\$100,000.00
3461	Johnson, Herman R.	\$30,000.00
3382	Johnson, Randy	\$50,000.00
1325	Johnson, Rosalind	\$40,000.00
1412	Johnson, Shawntay Marlo	\$1,000,000.00
3156	Johnson, William G.	\$500,000.00
402	Johnson, William L.	\$500,000.00
1257	Johnson,Timothy	\$250,000.00
1160	Jones, Elliot	\$250,000.00
556	Jones, Lee	\$50,000.00
1817	Jordan, Sharon K	\$29,039.40
2636	Joshua III, David	\$35,486.84
1925	K and P, Incorporated	\$1,563,107.76
1000	Karcher, Matthew	\$35,000.00
683	Kearns,Michael	\$100,000.00
2145	Kelso, Lana	\$500,000.00
3429	King, Aaron	\$30,000.00
1485	Knight, Deborah A.	\$25,914.21
1644	Knight, Roosevelt	\$30,000.00
3106	Koziara, Joseph S.	\$73,555.00
1922	Kuplicki, Stephen	\$181,495.19
2312	Larsen Melvin Lyle	\$30,000.00
539	Laze, Xhensila	\$500,000.00
2479	Leaks, Vanda M.	\$30,000.00
2114	Ledbetter, Joann	\$500,000.00
1002	Legette, Charnita	\$65,000.00
1150	Lewis, Antoine	\$100,000.00
766	Lewis, Walter	\$1,000,000.00
1901	Limbach Company LLC	\$186,837.50
3476	Living Arts	\$122,500.00
792	Llanes, James	\$60,000.00
2562	Loevy & Loevy	\$227,850.00
170	Lovati, Susan	\$250,000.00
2717	Loving, Courtney, Et Al	\$35,000.00
1617	Lowe, Veina	\$325,000.00
1008	Luckett, Moses	\$55,000.00
1482	Lukasik, Robert A.	\$32,218.82
1903	Lyons, George - Property Owner	\$99,712.72
2496	Mack, Donell	\$50,000.00
2372	Macuga, Liddle & Dubin P.C.	\$95,418.42
2372	Macuga, Liddle & Dubin P.C.	\$95,418.42
2374	Macuga, Liddle & Dubin P.C.	\$520,357.82
3067	Macuga, Liddle & Dubin, P.C.	\$395,622.09
2198	Malone, Mickey	\$125,000.00

# REVISED SCHEDULE OF LIQUIDATED AMOUNTS

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
151	Manos, Dino	\$30,000.00
567	Mansfield Patterson JR. as p.r.	\$100,000.00
3008	Mariners Inn	\$49,695.53
199	Marks, Robert, Sr.	\$32,500.00
2159	Martin, Rodney	\$100,731.27
1141	Mathis, James	\$40,000.00
2133	McCaa, Kennedy	\$500,000.00
3618	McClain, Archie	\$50,000.00
3379	McClain, Kanard D	\$30,000.00
557	McCloud, Anthony	\$50,000.00
685	McCracken, Thomas	\$100,000.00
3122	McCrary, Sarah M.	\$27,686.00
2769	McDonald, Kendra	\$55,393.00
1605	Mcdonald, Kevin	\$300,000.00
1640	McGee, Chantinique	\$200,000.00
3282	McGore, Sarina	\$25,669.44
2853	McIntosh, Rebecca	\$450,000.00
2848	McIntosh, Scott	\$125,000.00
1573	Mckay, Michael	\$42,500.00
2471	McKinney, Edgar	\$100,000.00
1133	McLemore, Tangela	\$175,000.00
3123	McMillon, Phyllis	\$33,971.13
2274	Mcperson, Randall	\$30,000.00
2735	Members of Association of Professional & Technical Employees	\$3,585,000.00
1762	Mendelson Orthopedics, PC	\$27,964.80
2044	Mendez-Velez, Carmen	\$250,000.00
3041	Mercer, Terence Lamont	\$65,000.00
2958	Michigan AFSCME Council 25 and its affiliated Detroit Locals	\$300,000,000.00
852	Michigan Auto Recovery Service	\$48,525.00
187	Michigan Biotech Partners LLC	\$45,600.00
1464	Michigan Center for Physical Therapy	\$26,440.40
10	Michigan Community Action Agency Association	\$77,014.00
806	Michigan Economic Dev Corp	\$402,438.92
807	Michigan Economic Dev Corp	\$5,081,780.82
808	Michigan Economic Dev Corp	\$2,000,000.00
3733	Michigan State Police	\$194,079.00
2971	Mid America Evaluation Group Inc	\$72,872.00
630	Migliori, Sebastian	\$30,000.00
1930	Miles II, Shawn D.	\$40,000.00
3174	Milewski, Brendan J	\$190,000.09
3001	Miller, Jason E	\$55,000.00
1525	Milliner, Mary	\$36,479.01
1534	Milliner, Mary	\$245,000.00
3289	Minniefield, Cheryl	\$2,000,000.00
3294	Minniefield, Cheryl	\$500,000.00
2992	Mitchell Jr., Alvin J.	\$40,010.00
2632	Mitchell, LaQuitsha D	\$100,000.00
141	Mitchell, Vivian	\$250,000.00
440	Moore, Christopher	\$40,000.00
2098	Moore, JaJuan	\$50,000.00
1795	Moore, Nedria G.	\$30,000.00
3071	Moore, Sharon	\$50,000.00
2120	Moore, Woodrow	\$250,000.00
88	Morton Salt	\$288,483.55
843	Mosley, Shelia	\$2,750,000.00
654	Neal, Bridgette	\$52,500.00
1550	Nelson, Shira, by Guardian Equania Nelson	\$200,000.00
2686	New Grace Spinal Rehabilitation, PLLC	\$143,569.47
394	Newell, Jamal	\$500,000.00
3210	Nixon-Lewis, Serina	\$250,000.00
1271	Noblett, Michael	\$80,000.00
142	Norfolk Southern Railway Company	\$36,128.73
3416	Norman, Twain	\$75,000.00
2780	Nunley, Thomas M.	\$28,724.24
836	Ohakpo, Simeon	\$1,400,000.00
2979	Oliver Jr, Robert L	\$62,000.00
1740	Oliver Jr., Bill	\$100,000.00

# REVISED SCHEDULE OF LIQUIDATED AMOUNTS

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
3786	Omega Rehab Services, LLC	\$36,316.96
3203	Oneal, Sandra R.	\$56,685.84
2295	Onuigbo, Diane L	\$60,805.40
3211	Ortiz, Stacey, Personal Representative of the Estate of Jason D. Baker, Deceased	\$1,000,000.00
1604	Parnell, Taesean a minor by his next friend Corliss Thomas	\$350,000.00
12	Payne, Jessie	\$2,980,000.00
2194	Peagler, Norman	\$150,000.00
558	Peeples, Eric	\$50,000.00
1792	Pembroke-Brown, Teresa	\$40,298.06
2966	Pennington, Audrey	\$90,000.00
1520	Pennington, LaTonya	\$25,498.35
3079	Perry, Vivian S.	\$33,695.76
2091	Person, Rodney	\$500,000.00
2265	Peterson, Heidi (plaintiff in Wayne County Circuit Court)	\$205,043.77
2269	Peterson, Heidi (Plaintiff in Wayne County Circuit Suit Against Water Department/City et. al.)	\$250,000.00
2275	Peterson, Heidi (Plaintiff in Wayne County Circuit Suit Against Water Department/City et. al.)	\$40,000.00
2015	Peterson, Jeffrey	\$400,000.00
1465	Peterson, Ronnie	\$75,000.00
1732	Pettway, Sharon	\$55,000.00
1255	Pharr, Patricia	\$35,000.00
2221	Physiomatrix, Inc.	\$28,535.00
2225	Physiomatrix, Inc.	\$41,105.00
2313	Pitt McGehee Palmer & Rivers, PC	\$29,375.00
1784	Poe, Cassandra E.	\$120,000.00
1006	Poindexter, Jessica	\$50,000.00
3378	Porter, Alphonso	\$90,000.00
849	Powell, Mary	\$75,000.00
1947	Prather II, Hayward R.	\$35,500.00
2458	Prodigy Spinal Rehabilitation Inc	\$177,810.80
2352	Property Owner	\$80,000.00
2965	Pryor, Gail	\$41,240.34
1882	Purcell, Demetira	\$30,000.00
2814	Purdue, Estate of Jo Ella	\$250,000.00
3	Quill.com	\$68,283.70
102	Rainbow Rehabilitation Center	\$32,082.00
1739	Ramirez, Patricia	\$1,500,000.00
1858	Randle, Zachary	\$29,733.58
1650	Rasnack, Donald	\$296,606.03
3131	Ratliff, Antonio D.	\$300,000.00
3583	Readous, Wendy n/f of Tamiah Green	\$50,000.00
889	Record Copy Services	\$56,291.95
2106	Rhone, Sidney	\$1,500,000.00
2181	Rias, Dwayne	\$195,000.00
3316	Richmond, Farrad	\$50,000.00
669	Riggins, Robert	\$82,500.00
561	Rivera, David	\$50,000.00
2961	Robbins, Tanzia	\$93,525.00
864	Robertson, Ivas	\$300,000.00
2002	Robinson, Jennifer	\$45,000.00
2027	Robinson, Lucreasi	\$75,000.00
3395	Rogers Davis, Robert	\$90,578.00
1518	Rogers, Jason	\$40,000.00
694	Rose, Jonathan Thomas-gregory	\$500,000.00
3207	Ross, Gregory	\$250,000.00
609	Roulo, Thomas	\$250,000.00
922	Rubenstein Isaacs Pc	\$101,422.30
1729	Rupert, Erin	\$200,000.00
1405	Russell, Major L.	\$1,000,000.00
2859	SAAA Union - Members	\$198,734.00
1348	Sawsan, Mohamed	\$250,000.00
1776	Scaife, Thelma	\$50,000.00
1849	Schenburn, Edward	\$30,000.00
925	Scott, Marvella	\$100,000.00
1397	Scott, Tamesha, a minor by her litigation guardian, Shawntay Marlo Johnson	\$75,000.00
1395	Scott, Terry, a minor by his litigation guardian Shawntay Marlo Johnson	\$75,000.00
560	Shack, Samuel	\$50,000.00
1857	Shafer & Associates, P.C.	\$1,563,107.76

# REVISED SCHEDULE OF LIQUIDATED AMOUNTS

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
2203	Shahid, Mohamed	\$185,000.00
1974	Shelton, Dewitt	\$28,000.00
354	Shelton, Maxine	\$2,000,000.00
86	Siemens Water Technologies, LLC	\$70,000.00
3068	Simmons, Anthony	\$241,325.00
802	Sims, Alicia	\$225,000.00
145	Sisco, Lonciann	\$75,000.00
1208	Sky Group Grand, LLC	\$1,465,409.79
3816	Sky Group Grand, LLC	\$5,447,749.44
2403	Smith & Wesson Corp	\$113,811.88
2667	Smith II, Jermaine	\$30,000.00
1775	Smith, Anthony Derrick	\$60,805.40
2849	Smith, Autumn	\$450,000.00
2200	Smith, Clarence D.	\$137,500.00
2415	Smith, Gregory K.S.	\$25,914.21
2205	Smith, Gretchin	\$450,000.00
1827	Smith, Keenan	\$380,015.36
2424	Smith, Lisa	\$26,000.00
1440	Smith, Reno	\$75,000.00
1594	Smith, Taralyn	\$75,000.00
1818	Smith, Taralyn	\$150,000.00
693	Southeast Michigan Council of Governments (SEMCOG)	\$28,130.00
1632	Spencer, Yvette	\$300,000.00
3451	Spicer, Kim	\$204,272.75
628	Sprint Corp.	\$277,784.77
871	St. Martins Cooperative	\$390,940.75
2185	Stallworth, Lula	\$100,000.00
787	Stanley, Sherell S.	\$750,000.00
2603	Stanley, Sherell Shawnee	\$987,525.00
2329	Starkey, DeAndre	\$40,000.00
3697	State of Michigan	\$366,514.10
3712	State of Michigan, Department of Community Health	\$1,805,725.77
3767	State of Michigan, Department of Community Health	\$789,924.00
3764	State of Michigan, Department of Human Services	\$11,949,405.00
3766	State of Michigan, Department of Human Services	\$597,040.00
3709	State of Michigan, Department of Human Services, Bureau of Comm. Action & Economic Opp.	\$2,114,768.70
3731	State of Michigan, Department of Transportation	\$62,132.00
3742	State of Michigan, Department of Transportation	\$673,096.87
3750	State of Michigan, Dept. of Environmental Quality	\$203,810.63
3751	State of Michigan, Dept. of Environmental Quality	\$1,505,684.00
3283	Steele, Natasha	\$30,000.00
827	Stenbom, Maria	\$2,000,000.00
2094	Stewart, LaNeta	\$80,000.00
1772	Strange, Hope	\$39,698.06
844	Street-Gilbert, Joera	\$250,000.00
1454	Suell, Geraldine	\$45,000.00
3222	Sumo, Quewou	\$33,000.00
856	Superior Investment Group, Llc	\$44,960.00
1852	Synergy Spine and Orthopedic Surgery Center LLC	\$34,008.00
3048	Talbert, Sheree	\$30,302.50
2041	Taylor, Tamara	\$40,000.00
282	Tech Town	\$966,472.00
1599	Tharpe, Phyllis	\$500,000.00
894	The Detroit Medical Center, as agent for Harper-Hutzel Hospital	\$69,247.40
1390	The Realty Company	\$589,490.02
481	The Sam Bernstein Law Firm	\$165,000.00
1378	Thomas, Laverne	\$400,000.00
2323	Thomas, Randall	\$39,997.10
1646	Thompson, Keith	\$30,000.00
1641	Thompson, Raymond	\$150,000.00
2964	Thornton, Marvin	\$200,000.00
530	Todd, Jr., Ira Lee	\$3,297,471.00
2201	Torres, Daniel	\$100,000.00
3440	Townsend, Evangeline	\$30,000.00
1441	Tramel, Norman	\$36,350.00
3154	Trivedi, Ranna K.	\$27,437.00
2279	Tulik, Mark	\$40,000.00

**REVISED SCHEDULE OF LIQUIDATED AMOUNTS**

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
3116	Turner, Christopher	\$100,000.00
848	Turner, Corey	\$350,000.00
496	Turner, Omar Jackson, Renette, AJ & Associates at Law	\$50,000.00
3464	Turner, Pamela	\$350,000.00
114	Turner, Rhonda	\$1,000,000.00
3657	U.S. Equal Employment Opportunity Commission	\$200,000.00
3658	U.S. Equal Employment Opportunity Commission	\$204,572.41
3659	U.S. Equal Employment Opportunity Commission	\$207,587.67
3660	U.S. Equal Employment Opportunity Commission	\$55,658.90
3661	U.S. Equal Employment Opportunity Commission	\$100,000.00
3662	U.S. Equal Employment Opportunity Commission	\$115,769.80
3663	U.S. Equal Employment Opportunity Commission	\$200,000.00
3664	U.S. Equal Employment Opportunity Commission	\$100,000.00
3665	U.S. Equal Employment Opportunity Commission	\$122,531.55
112	Uddin, Rafuth, a Minor, by His Next Friend, Rehan Uddin	\$50,000.00
3719	United States Department of Housing and Urban Development	\$112,384.28
3773	United States Department of Housing and Urban Development	\$2,670,774.06
23	USAA Insurance	\$47,079.29
2601	Van Dyke Spinal Rehabilitation	\$61,829.19
1003	Vann, Lolita	\$55,000.00
822	Varnum Riddering Schmidt	\$43,148.91
1798	Vaughn, Tamiko	\$75,000.00
2109	Walker, Kevin	\$500,000.00
3073	Walker, Laurie	\$60,000.00
2898	Walker, Lenetta	\$25,223.00
3381	Walker, Shirley W	\$29,000.00
132	Wallace, Wilda	\$50,000.00
996	Warren, Joy as next friend of Jalen Warren, a minor	\$100,000.00
1307	Washington, Jaylen	\$50,000.00
392	Washington, Johnnie	\$500,000.00
2497	Weaver, Daryl	\$50,000.00
2506	Weaver, Daryl	\$50,000.00
3097	Weber Block LLC	\$1,000,000.00
5	Wells Fargo Financial Leasing, Inc.	\$26,588.81
633	Weston, Cab C.	\$75,000.00
863	Wheeler, Fred Douglas	\$57,360.00
1589	White, Bernard	\$60,000.00
862	White, Ramona F.	\$50,000.00
1653	White, Terecia	\$175,000.00
2110	Whitfield, Carlton	\$130,000.00
1595	Wilburn, Tarita	\$170,000.00
1613	Wilburn-Little, Jenita	\$200,000.00
1802	William Acosta, PLLC	\$168,075.40
2282	Williams Acosta, PLLC	\$139,752.01
2184	Williams Jr., Charley	\$100,000.00
121	Williams, Angelia	\$5,000,000.00
393	Williams, Anthony	\$500,000.00
407	Williams, Charles W.	\$500,000.00
1898	Williams, Denise	\$30,000.00
2524	Williams, Gloria	\$2,000,000.00
3279	Williams, Keith	\$10,000,000.00
965	Williams, La-sheryl,	\$40,000.00
1689	Williams, Mark	\$50,000.00
1434	Williams, Michael A	\$26,500.00
3362	Williams, Shannon	\$75,000.00
3437	Williams, Shawn	\$50,000.00
2190	Williams, Troy	\$50,000.00
2182	Williams, Vashay	\$150,000.00
2045	Williams-Carter, Katrinia	\$80,000.00
573	Williamson, Decarlos	\$1,000,000.00
572	Williamson, Tracy (p.r. Of Williamson, Decarlos)	\$100,000.00
2118	Willis, Deborah	\$100,000.00
1138	Wilmington Trust, National Association, as successor Contract Administrator	\$644,277.66
3596	Wilson, Reginald	\$90,000.00
1734	Wilson, Victoria	\$200,000.00
335	Winston, Quincy L.	\$1,900,000.00
2353	Wojnarski, Joanne	\$750,000.00

## REVISED SCHEDULE OF LIQUIDATED AMOUNTS

*Note that, in most cases, the Liquidated Amounts set forth below reflect the amounts asserted in the applicable proofs of claim. These amounts may be reduced by any resolution or adjudication of such proofs of claim.*

Claim Number	Claimant	Liquidated Amount
2397	Wojnarski, JoAnne, Personal Representative of the Estate of Jerry Willcockson, Deceased	\$150,000.00
3100	Wojnarski, JoAnne, Personal Representative of the Estate of Jerry Willcockson, Deceased	\$150,000.00
3232	Wolak, Steven, as Personal Representative of the Estate of Christopher Wolak, Deceased	\$3,000,000.00
2552	Wolf Jr., Cloyd	\$50,000.00
1039	Wolske, Michael Allen	\$2,000,000.00
1603	Woods, Jay	\$210,750.00
2546	Woody, John	\$125,473.00
3340	Wooten, Walter	\$80,000.00
2231	Worde, Mark	\$200,000.00
128	Wright, Anna c/o Leonard M. Koltonow	\$430,000.00
116	Xerox Corporation	\$106,507.79
3010	Yarborough, Shardaye, a Minor, by Her Mother and Next Friend Charmane Alvis	\$250,000.00
3121	Zyrron Demetric Collins	\$100,000.00
<b>TOTAL</b>		<b>\$967,997,152.05</b>

**EXHIBIT C**

# REVISED SCHEDULE OF RECLASSIFICATION CLAIMS

Claim Number	Claimant	Claim Amount
1171	Assured Guaranty Corp	Unliquidated
1169	Assured Guaranty Municipal Corp.	\$2,037,867.00
2970	Dexia Credit Local	\$255,000,000.00
3592	Fitzgerald, Susan	\$50,000.00
806	Michigan Economic Dev Corp	\$402,438.92
807	Michigan Economic Dev Corp	\$5,081,780.82
808	Michigan Economic Dev Corp	\$2,000,000.00
3508	Morreale, Jerome	\$5,000.00
3652	Murowski, Marie C & Andrea Murowski JT	\$45,000.00
3496	Salgado-Galicia, Hector J.	\$8,695.00
3690	Shaw, James G.	\$50,000.00
3714	United States Department of Housing and Urban Development	\$1,837,217.00
3716	United States Department of Housing and Urban Development	\$10,371,138.25
3655	Westerbeck, Kent	\$30,000.00
1138	Wilmington Trust, National Association, as successor Contract Administrator	\$803,702,214.66

**EXHIBIT D**

**REVISED SCHEDULE OF WHOLLY UNLIQUIDATED LITIGATION  
CLAIMS SUBJECT TO TREATMENT IN CLASS 14 UNDER THE PLAN**

Claim Number	Claimant
2259	Armstrong, Alexis
1728	Cannon, Vincent via his attorneys, Gursten, Koltonow, Gursten, Christensen & Raitt, P.C.
2273	Chambers, Theotrice
124	Charter Township of Plymouth
2833	Class Claimants
2994	Darrah, Lucinda J.
3485	<b>Detroit Fire Fighters Association, IAFF Local 344</b>
3493	<b>Detroit Fire Fighters Association, IAFF Local 344</b>
3681	<b>Detroit Fire Fighters Association, IAFF Local 344</b>
1735	Doe, K.S.
866	Fountain Court Consumer Housing Cooperative
2931	Johnson-woods, Linda
2822	Joliet Town Houses Cooperative Association
2490	Jones, Valine B/n/f Jones, Arnaz
1631	Kelly, Toyia Personal Rep of Estate of Kevin Ivie
2863	Lafayette Town Houses, Inc.
2825	Lasalle Town Houses Cooperative Association
2264	McCormick, Letha
3426	Miller, Kevin
2706	Moore Jr., David
3428	Moore, Jerome
3798	Murriel, Bridget
3799	Murriel, Bridget
2828	Nicolet Town Houses Cooperative Association
3468	Roseman, Mark and Luzater
1624	Soto, Daniel
2823	St. James Cooperative
2268	Stevenson, Kenya
2263	Truelove, Omar
323	Whitaker, Mary
1468	Williams Jr., Ronald

### **CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing *Consolidated Reply in Support of Motion of the City of Detroit, Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and Bankruptcy Rule 3021, for an Order Approving Reserve Amounts for Certain Disputed or Unliquidated Unsecured Claims in Connection with Distributions to Be Made Under the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit* was filed and served via the Court's electronic case filing and noticing system on this 10th day of April, 2015.

/s/ Heather Lennox